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2 ATTORNEY AT LAW  
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4 Attorney for Defendant  
HEATHER ROMOSER

6 IN THE UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,  
10 Plaintiff,

11 v.

12 HEATHER ROMOSER,  
13 Defendant

CASE NO. 2:21-CR-00110-DAD-5

**STIPULATION TO CONTINUE  
SENTENCING; ORDER**

15 Defendant HEATHER ROMOSER, by and through her counsel of record, TONI WHITE,  
16 and the GOVERNMENT, by and through Assistant United States Attorneys EMILY SAUVAGEAU  
17 and ROBERT ABENDROTH, hereby stipulate as follows:

- 18 1. By previous order, this matter was set for sentencing on May 21, 2025.  
19 2. By this stipulation, defendant now moves to continue the sentencing to June 9, 2025.

20 The GOVERNMENT does not oppose this request.

21 3. The draft probation report was filed on March 6, 2025. Additional time is needed to  
22 complete the final report. More time will be needed for review of the final report, once completed,  
23 and preparation of sentencing briefing. Defendant also needs additional time to gather sentencing  
24 mitigation. Lastly, a psychological evaluation of Ms. Romoser has been completed and the  
25 psychologist indicates that the report should be available in the next week. We do not have it at this  
26 time and it is needed to support Ms. Romoser's mitigation package.

1 4. The probation officer, Lynda Moore, is available and is in agreement with the disclosure  
2 schedule requested by the parties.

3 5. The parties request the following disclosure schedule:

4 Judgment and Sentencing Date: June 9, 2025

5 Reply, or Statement of Non-opposition: June 4, 2025

6 Motion for Correction of the Presentence Report shall be filed  
7 with the Court and served on the Probation Officer and opposing  
counsel no later than: June 2, 2025

8 The Pre-Sentence Report Shall be Filed with the Court and  
9 Disclosed to Counsel no Later Than: May 26, 2025

10 The Proposed Pre-Sentence Report Has Been Disclosed  
11 to Counsel.

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17 IT IS SO STIPULATED.

18 Dated: May 16, 2025

MICHELE BECKWITH  
Acting United States Attorney

19 By: /s/ Emily Sauvageau  
20 EMILY SAUVAGEAU  
21 Assistant U.S. Attorney

22 For the United States

23 Dated: May 16, 2025

24 By: /s/ Robert Abendroth  
25 ROBERT ABENDROTH  
26 Assistant U.S. Attorney

27 For the United States

Dated: May 16, 2025

By: /s/ Toni White  
TONI WHITE  
For Defendant  
Heather Romoser

**ORDER**

IT IS SO ORDERED.

Dated: May 16, 2025

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE